

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054**

In the Matter of)	
)	
Pacific Gas and Electric Company)	WT Docket No. 10-217
)	
Requests for Waiver of Slow Growth)	
Authority and of Discontinuance Rules)	

To: Chief, Wireless Telecommunications Bureau

REPLY

Pacific Gas and Electric Company (“PG&E”) hereby replies to the Comments of the Enterprise Wireless Alliance (“EWA”) filed in response to the Commission’s Public Notice¹ inviting comment on PG&E’s requests for waiver of the rules to permit extended implementation of its wide area private land mobile radio system and for waiver of the rules on permanent discontinuance of operation. EWA was the only party to comment on PG&E’s waiver requests.

PG&E appreciates EWA’s support for its waiver requests. As EWA noted, “PG&E could not be expected to embark on this undertaking without confidence that it has the necessary spectrum resources to build its intended system and, therefore, it needs to secure the requisite FCC authorizations at this time.”² This is exactly the situation confronting PG&E and the reason why PG&E needs waiver of the rules. As explained in detail in PG&E’s waiver requests, the Radio Network Refresh Project will require PG&E to expend considerable resources over the next three years to reconfigure and deploy hundreds of Part 22 and Part 90 frequencies at over 100 transmitter sites providing coverage to PG&E’s more than 74,000 square mile electric and

¹ *Wireless Telecommunications Bureau Seeks Comment on Request by Pacific Gas & Electric Company for Waivers to Permit Implementation of Wide-Area Land Mobile Radio System Using Part 22 and 90 Spectrum*, Public Notice, WT Docket No. 10-217, released October 22, 2010.

² EWA Comments, at 2.

gas service area in central and northern California. It is simply impossible for PG&E to complete the system within the 12 months normally authorized for construction of “new” frequencies, and it would be a waste of ratepayers’ funds for PG&E to maintain continuous operation on existing frequencies just to avoid automatic termination of authorization under the FCC’s rules on permanent discontinuance of operation. As EWA observes, PG&E is not abandoning use of the frequencies at all; it simply needs “to temporarily remove them from operation so they can be repurposed as part of a more efficient network, one that will be capable of satisfying the increasingly demanding communications requirements of a major utility that services millions of customers.”³

PG&E notes that no one has opposed PG&E’s waiver request. In view of the substantial public interest in PG&E’s implementing the Radio Network Refresh Project without the additional burdens that would be imposed by strict compliance with the Commission’s rules on construction deadlines and permanent discontinuance of operation, PG&E respectfully requests that the Commission promptly grant the relief requested in its waiver requests.

Respectfully submitted,

PACIFIC GAS AND ELECTRIC COMPANY

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³ EWA Comments, at 3.

CERTIFICATE OF SERVICE

I, Tamara Mundy, a secretary with the law firm of Fish & Richardson P.C., hereby certify that I have caused to be sent, by first class mail, postage prepaid, a copy of the foregoing "Reply" of Pacific Gas and Electric Company, this 22nd day of November, 2010, to each of the following:

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